

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WASIM AHMED,

Plaintiff(s),

v.

REGINALD B. LUCAS; BCT, INC., a/k/a B
CLEAN TRANSPORTATION, INC; and JOHN
DOES 1-10, (owners of a commercial vehicle
and/or cargo or lessors a commercial vehicle
operated by Reginald Lucas that was involved in a
November 6, 2019 crash in Elizabeth, New Jersey
at or near 819 North Avenue East,

Defendants.

Civil Action No.:

Hon.

NOTICE OF REMOVAL

**TO: CHIEF JUDGE AND JUDGES OF THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

ON NOTICE TO: Frank Lazzaro, Esq.
LUTZ, SHAFRANSKI, GORMAN & MAHONEY, P.A.
77 Livingston Avenue
P.O. Box 596
New Brunswick, New Jersey 08903

Clerk – Law Division
Superior Court of New Jersey
Middlesex County Courthouse
56 Patterson St.
New Brunswick, New Jersey 08903

PLEASE TAKE NOTICE that defendants Reginald B. Lucas and B Clean Transportation, Inc. d/b/a BCT, Inc. through their counsel, Tompkins, McGuire, Wachenfeld & Barry, LLP hereby remove this civil action pending in the Superior Court of New Jersey, Middlesex County, Law Division (“the State Court Action”), docket number MID-L-5686-21, pursuant to U.S.C. 28 §§ 1441 and 1446, as amended, and in accordance with 28 U.S.C. § 1332, as amended, on the following grounds:

1. As more fully set forth below, this case is properly removed to this Court pursuant to 28 U.S.C. §§ 1332 and 1441 because the procedural requirements for removal are satisfied and because this is a civil action between citizens of different states in which the amount in controversy exceeds \$75,000, exclusive of interest and costs.

I. THE PROCEDURAL REQUIREMENTS FOR REMOVAL ARE SATISFIED.

2. On September 29, 2021 Plaintiff commenced the State Court Action by filing a Complaint identified by Superior Court docket number MID-L-5686-21 (“Complaint”) with the Deputy Clerk of the Superior Court, Middlesex County, New Jersey. (A true and exact copy of the Complaint is annexed as Exhibit A).
3. The Complaint names as defendants Reginald B. Lucas and BCT, Inc. a/k/a B Clean Transportation Inc.; both are citizens of Mississippi. (Exhibit B, police report). Various fictitious defendants’ citizenship is disregarded for purposes of establishing diversity. *See* 28 U.S.C. § 1441(b)(“[T]he citizenship of defendants sued under fictitious names shall be disregarded”).
4. This Notice of Removal is timely under 28 U.S.C. § 1446(b). Plaintiff’s counsel has advised that defendant B. Clean Transportation, Inc. was served on November 3, 2021, less than 30 days ago. Defendant Lucas has not been served.

5. The United States District Court for the District of New Jersey embraces the locality in which the State Court Action is now pending and, thus, this Court is a proper forum for this action pursuant to 28 U.S.C. § 1441(a).
6. No previous application for removal has been made.
7. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon Plaintiff's counsel and a copy is being filed with the Clerk of the Superior Court of New Jersey – Law Division, Middlesex County.

II. REMOVAL IS PROPER BECAUSE THIS COURT HAS SUBJECT MATTER JURISDICTION PURSUANT TO 28 U.S.C. §§ 1332 and 1441.

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because this is a civil action between citizens of different states in which the amount in controversy exceeds \$75,000 exclusive of costs and interest.

A. Complete Diversity of Citizenship Exists.

1. Plaintiff's Citizenship.

9. Plaintiff resides in Monmouth Junction, New Jersey. (Ex. A). *See McCann v. Newman Irrevocable Trust*, 458 F.3d 281, 286 (3d Cir. 2006)(for purposes of diversity jurisdiction, “[c]itizenship is synonymous with domicile ...”).

2. Defendants' Citizenship.

10. Defendants are Mississippi citizens. Defendant Lucas resides in Mississippi. (Ex. B). Defendant B. Clean Transportation, Inc. is a Mississippi corporation with its principal place of business at 321 Lower Myrick Road, Laurel, Mississippi 39443. *See* <https://corp.sos.ms.gov/corp/portal/c/page/corpBusinessIdSearch/portal.aspx#> (accessed November 17, 2021). 28 U.S.C. § 1332(c)(1)(defining corporate citizenship).

B. The Amount in Controversy Requirement is Satisfied.

11. Defendants respectfully submit that the amount in controversy exceeds \$75,000.

See 28 U.S.C. § 1332(a).

12. This is a personal injury action involving a motor vehicle accident, wherein Plaintiff claims as follows:

3. As a direct and proximate result of the aforesaid negligence of the defendants, and each of them, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expense, and has and will be unable to engage in his usual occupation, duties, and activities all to his damage.

(Ex. A)

13. New Jersey state court practice does not permit plaintiffs to plead for damages in a specific amount. *See* 28 U.S.C. § 1446(c)(2)(A)(ii). *See also* N.J.R.Civ.P. 4:5-2.
14. However, “courts have held that allegations of severe injuries along with pain and suffering will alert [the] defendant that an amount in excess of [the jurisdictional amount] is at issue.” *Carroll v. United Air Lines, Inc.*, 7 F. Supp. 2d 516, 521 (D.N.J. 1998).
15. Accordingly, pursuant to 28 U.S.C. § 1446(c)(2)(B) the amount in controversy exceeds \$75,000 for purposes of this application.

C. The Unanimity Rule is Satisfied.

16. Removal generally requires unanimity among the defendants that have been served with the Complaint. *Balazik v. Cty. of Dauphin*, 44 F.3d 209, 213 (3d Cir. 1995).

17. At this time, only one defendant has been served.

D. This Case Should be Assigned to the Newark Vicinage.

18. Finally, Defendants submit that this matter should be assigned to this Court's Newark vicinage, since the accident in question occurred in Elizabeth, County. (Ex. A). L.Civ.R. 40.1(a) (allocation based on the residence of defendant, convenience of litigants, counsel and witnesses, and the place where the cause of action arose). *See also, Jennings v. Exelrod*, 2011 U.S. Dist. LEXIS 68820 (D.N.J. June 27, 2011)(Pisano)(plaintiff's residence is not a factor in determining allocation).

WHEREFORE, Defendants respectfully remove this action from the Superior Court of New Jersey to this Court pursuant to 28 U.S.C. §§ 1331, 1441 and 1446.

Respectfully submitted,

s/ Jared P. DuVoisin

Jared P. DuVoisin

TOMPKINS, McGUIRE,

WACHENELD & BARRY, LLP

3 Becker Farm Road, Suite 402

Roseland, New Jersey 07068

(973) 622-3000

jduvoisin@tompkinsmcguire.com

Attorneys for Defendants

Reginald B. Lucas and

B Clean Transportation Inc. d/b/a BCT, Inc.

LOCAL RULE 11.2 CERTIFICATION

Pursuant to Local Rule 11.2, the undersigned hereby certifies that there are no other related actions pending to the best of my knowledge, information and belief.

s/ Jared P. DuVoin

Jared P. DuVoin

**TOMPKINS, McGUIRE,
WACHENELD & BARRY, LLP**

3 Becker Farm Road, Suite 402

Roseland, New Jersey 07068

(973) 622-3000

jduvoisin@tompkinsmcguire.com

Attorneys for Defendants

Reginald B. Lucas and

B Clean Transportation Inc. d/b/a BCT, Inc.

CERTIFICATION OF SERVICE

I hereby certify that on this date, a Notice of Removal and filed with the Court and served on the following via the New Jersey State Judiciary electronic filing system:

Frank Lazzaro, Esq.
LUTZ, SHAFRANSKI, GORMAN & MAHONEY, P.A.
77 Livingston Avenue
P.O. Box 596
New Brunswick, New Jersey 08903

Clerk – Law Division
Superior Court of New Jersey
Middlesex County Courthouse
56 Patterson St.
New Brunswick, New Jersey 08903

s/ Jared P. DuVoisin

DATED: November 17, 2021

EXHIBIT

A

LUTZ, SHAFRANSKI, GORMAN AND MAHONEY, P.A.
77 Livingston Avenue
P.O. Box 596
New Brunswick, New Jersey 08903
(732)249-0444
Attorney for Plaintiff(s)
Attorney Bar #023872006

Plaintiff(s) WASIM AHMED	SUPERIOR COURT OF NEW JERSEY LAW DIVISION MIDDLESEX COUNTY
Vs.	DOCKET NO. MID-L-
Defendant(s) REGINALD B. LUCAS; BCT, INC. A/K/A B CLEAN TRANSPORTATION, INC.; and, JOHN DOES 1-10, (owners of a commercial vehicle and/or cargo or lessors a commercial vehicle operated by Reginald Lucas that was involved in a November 6, 2019 crash in Elizabeth, New Jersey at or near 819 North Avenue East)	Civil Action COMPLAINT AND DEMAND FOR TRIAL BY JURY

Plaintiff, Wasim Ahmed, residing at 16 Anderson Way,
Monmouth Junction, New Jersey, complaining of the defendants,
hereby alleges and says:

FIRST COUNT

1. On or about November 6, 2019, the plaintiff was
lawfully operating a vehicle in an eastbound direction on North
Avenue East near an exit ramp in Elizabeth, New Jersey.

2. At the time and place aforesaid, the defendants, BCT,
Inc. a/k/a B Clean Transportation, Inc., and/or John Does 1-10,
were the owners of a motor vehicle which was carelessly and
negligently operated by its agent, servant, employee and/or

representative, defendant, Reginald Lucas, as a result of which it struck the vehicle operated by the plaintiff.

3. As a direct and proximate result of the aforesaid negligence of the defendants, and each of them, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expense, and has and will be unable to engage in his usual occupation, duties, and activities all to his damage.

WHEREFORE, the plaintiff demands judgment against defendants, and each of them, for damages, interest, and costs of suit on the First Count.

SECOND COUNT

1. Plaintiff repeats and reiterates each and every paragraph of the First Count as if fully set forth herein at length.

2. At all times relevant herein, defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, were motor vehicle carriers involved in interstate commerce, as defined by the Federal Carrier Motor Safety Act 49 CFR Parts 300-399, and/or motor carriers involved in intrastate commerce, as defined by N.J.A.C. 13:60-1.1, et seq.

3. At all times relevant herein, defendants, BCT, Inc. a/k/a B Clean Transportation, Inc., and/or John Does 1-10, were

entities which do business in multiple states, including New Jersey.

4. At all times relevant herein, defendant, Reginald Lucas, acted within the scope of a statutory employee, servant and/or agent relationship with the defendants, BCT, Inc. a/k/a B Clean Transportation, Inc., and/or John Does 1-10.

5. Defendant, Reginald Lucas's, operation of the commercial vehicle in interstate and intrastate commerce is governed by the aforementioned statutes and he was negligent per se based on these statutory and regulatory violations.

6. Defendant, Reginald Lucas, violated state and federal statutes and regulations as applicable to both he as a commercial motor vehicle driver, and the regulated motor vehicle carriers noted herein.

7. Defendant, Reginald Lucas, was negligent per se based on these statutory violations.

8. As a direct and proximate result of the defendant, Reginald Lucas's, statutory violations, plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expenses, and has and will be unable to engage in his usual occupation, duties, and activities, all to his damage.

WHEREFORE, the plaintiff demands judgment against the defendants, and each of them, for damages, interest and costs of suit on the Second Count.

THIRD COUNT

1. Plaintiff repeats and reiterates each and every paragraph of the preceding Counts as if fully set forth herein at length.

2. Defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, had a duty to act reasonably in hiring, training, supervision, and retaining defendant, Reginald Lucas, and to entrust Reginald Lucas with the operation of a commercial motor vehicle and to promulgate and enforce rules and regulations to ensure its drivers and vehicles were reasonably safe.

3. Defendant, Reginald Lucas, was not competent to safely operate commercial vehicles at the beginning and throughout the course of employment with BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10.

4. Defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, negligently hired, failed to train, failed to supervise defendant Reginald Lucas as a commercial motor vehicle operator and were otherwise negligent by entrusting defendant Reginald Lucas with the operation of a commercial motor vehicle at its direction under its operative authority.

5. As a result of the negligence of defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, as

aforesaid, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expenses, and has and will be unable to engage in his usual occupation, duties, and activities, all to his damage.

WHEREFORE, the plaintiff demands damages against the defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, for damages, interest and costs of suit on the Third Count.

FOURTH COUNT

1. Plaintiff repeats and reiterates each and every paragraph of the preceding Counts as if fully set forth at length herein.

2. Pursuant to the Federal Motor Carrier Safety Act, 49 CFR parts 300-399, specifically FMCSR Section 390.3 (e)(1), defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, were required to be knowledgeable of and comply with all regulations applicable to its operation.

3. Pursuant to the Federal Motor Carrier Safety Act, 49 CFR parts 300-399, specifically FMCR Section 390.3 (e)(1), defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, were required to instruct defendant Reginald Lucas, regarding all applicable regulations.

4. Pursuant to the Federal Motor Carrier Safety Act, 49CFR parts 300-399, specifically, FMCSR Section 390.13, defendants,

BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, were prohibited from aiding, abetting, encouraging or requiring, defendant, Reginald Lucas, to violate the applicable regulations.

5. The defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and John Does 1-10, violated and encouraged defendant Reginald Lucas to violate state and federal statutes and regulations and fostered an environment that created, allowed, and encouraged a systematic violation of state and federal statutes and regulations including, but not limited to, the Federal Motor Carrier Safety Act.

6. As a direct and proximate result of defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, actions/inactions as aforesaid, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expenses, and has and will be unable to engage in his usual occupation, duties and activities, all to his damage.

WHEREFORE, the plaintiff demands judgment against the defendants, BCT, Inc. a/k/a B Clean Transportation, Inc. and/or John Does 1-10, for damages, interest and costs of suit on the Fourth Count.

DEMAND FOR TRIAL BY JURY

Plaintiff demands trial by jury as to all issues in the within Complaint.

DESIGNATION OF TRIAL COUNSEL

In accordance with R. 4:25-4, **Frank Lazzaro, Esq.**, is hereby designated at trial counsel in the within matter.

CERTIFICATION PURSUANT TO R. 4:5-1

The matter in controversy in this case is not, to the best of my knowledge, the subject of any other action pending in any Court or pending Arbitration proceeding, nor is any action or Arbitration contemplated at this time. I am not aware of any other parties who should be joined in this action at the present time.

The undersigned hereby certifies and this Complaint contains no personal confidential identifiers and that the undersigned recognizes the responsibility to ensure the same as to subsequent proceedings.

LUTZ, SHAFRANSKI, GORMAN and
MAHONEY, P.A.

BY: 

FRANK LAZZARO, ESQ.
Attorneys for Plaintiff(s).

DATED: September 29, 2021

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-005686-21

Case Caption: AHMED WASIM VS LUCAS REGINALD

Case Initiation Date: 09/29/2021

Attorney Name: FRANK T LAZZARO

Firm Name: LUTZ SHAFRANSKI GORMAN & MAHONEY,
PA

Address: 77 LIVINGSTON AVE P.O. BOX 596

NEW BRUNSWICK NJ 08903

Phone: 7322490444

Name of Party: PLAINTIFF : Ahmed, Wasim

Name of Defendant's Primary Insurance Company

(if known): National Liability Fire

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: Wasim Ahmed? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

09/29/2021

Dated

/s/ FRANK T LAZZARO

Signed

EXHIBIT B

04/14/20 12:20:41 Allstate_RFC

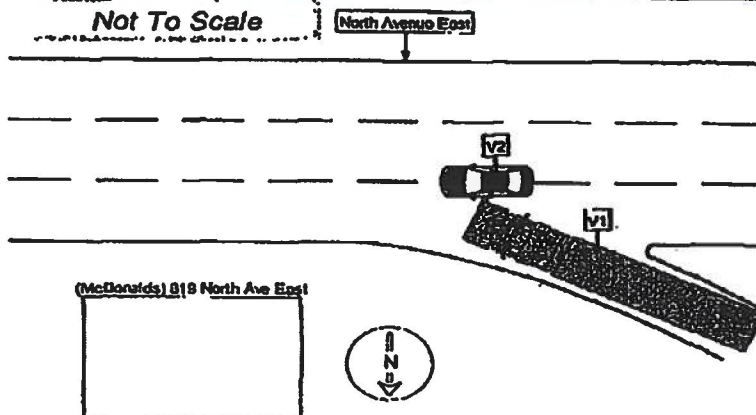
→ PARAMOUNT INSURANCE Allstate Insurance C Page 832

01	1. Case Number 19-165084	10. Crash Occurred On: 819 North Avenue East	11. Speed Limit 25	12. Route No. 01	13. Road Name 00
06	2. Police Dept. of Elizabeth	3. Station/Section 01	4. Date of Crash 11/06/19	5. Time of Crash 17:52	6. Day of Week 04
07	7. Month of Crash 11	8. Year of Crash 19	9. Time of Day 17:52	10. Day of Week 04	11. Month of Crash 11
01	12. Vehicle # V1	13. Policy No. 174	14. NJ Ins. Code 174	15. Vehicle # V2	16. Policy No. 054
04	17. Driver's First Name Reginald	18. Driver's Last Name Lucas	19. Driver's Sex M	20. Driver's First Name Wasim	21. Driver's Last Name Ahmed
02	22. Number & Street 445 West Lone Pilgram ROA	23. City Forest, MS 39074	24. State MS	25. Number & Street 16 Anderson Way	26. City Monmouth Jct, NJ 08852-2762
01	27. Eye Color BRN	28. Hair Color BRN	29. Height 5'11"	30. Eye Color BRN	31. Hair Color BRN
02	32. Driver's License Number 1006174	33. Date of Birth 10/06/74	34. Sex M	35. Driver's License Number A2564	36. Date of Birth 03/01/61
02	37. Driver's First Name INC	38. Driver's Last Name B	39. Driver's Sex M	40. Driver's First Name INC	41. Driver's Last Name B
23	42. Number & Street 86 Don Curt Rd	43. City Laurel, MS 39440-5430	44. State MS	45. Number & Street 19XFB2F59FE701882	46. City 19XFB2F59FE701882
01	47. Make PTRB	48. Model TR	49. Color Blk	50. Make HON	51. Model CIV
02	52. Year 201	53. Plate No. A442363	54. State MS	55. Year 15	56. Plate No. Y78LFZ
01	57. VIN 1XPXD49X8JD476158	58. Express 11/19	59. VIN 19XFB2F59FE701882	60. Express 05/20	61. VIN 19XFB2F59FE701882
01	62. Vehicle Removed to: Destination	63. Vehicle Removed to: Destination	64. Vehicle Removed to: Destination	65. Vehicle Removed to: Destination	66. Vehicle Removed to: Destination
02	67. Driver's License Number 1006174	68. Date of Birth 10/06/74	69. Sex M	70. Driver's License Number A2564	71. Date of Birth 03/01/61
02	72. Driver's First Name INC	73. Driver's Last Name B	74. Driver's Sex M	75. Driver's First Name INC	76. Driver's Last Name B
02	77. Number & Street 86 Don Curt Rd	78. City Laurel, MS 39440-5430	79. State MS	80. Number & Street 19XFB2F59FE701882	81. City 19XFB2F59FE701882
02	82. Make PTRB	83. Model TR	84. Color Blk	85. Make HON	86. Model CIV
02	87. Year 201	88. Plate No. A442363	89. State MS	90. Year 15	91. Plate No. Y78LFZ
02	92. VIN 1XPXD49X8JD476158	93. Express 11/19	94. VIN 19XFB2F59FE701882	95. Express 05/20	96. VIN 19XFB2F59FE701882
02	97. Vehicle Removed to: Destination	98. Vehicle Removed to: Destination	99. Vehicle Removed to: Destination	100. Vehicle Removed to: Destination	101. Vehicle Removed to: Destination
02	102. Driver's License Number 1006174	103. Date of Birth 10/06/74	104. Sex M	105. Driver's License Number A2564	106. Date of Birth 03/01/61
02	107. Driver's First Name INC	108. Driver's Last Name B	109. Driver's Sex M	110. Driver's First Name INC	111. Driver's Last Name B
02	112. Number & Street 86 Don Curt Rd	113. City Laurel, MS 39440-5430	114. State MS	115. Number & Street 19XFB2F59FE701882	116. City 19XFB2F59FE701882
02	117. Make PTRB	118. Model TR	119. Color Blk	120. Make HON	121. Model CIV
02	122. Year 201	123. Plate No. A442363	124. State MS	125. Year 15	126. Plate No. Y78LFZ
02	127. VIN 1XPXD49X8JD476158	128. Express 11/19	129. VIN 19XFB2F59FE701882	130. Express 05/20	131. VIN 19XFB2F59FE701882
02	132. Vehicle Removed to: Destination	133. Vehicle Removed to: Destination	134. Vehicle Removed to: Destination	135. Vehicle Removed to: Destination	136. Vehicle Removed to: Destination
02	137. Driver's License Number 1006174	138. Date of Birth 10/06/74	139. Sex M	140. Driver's License Number A2564	141. Date of Birth 03/01/61
02	142. Driver's First Name INC	143. Driver's Last Name B	144. Driver's Sex M	145. Driver's First Name INC	146. Driver's Last Name B
02	147. Number & Street 86 Don Curt Rd	148. City Laurel, MS 39440-5430	149. State MS	150. Number & Street 19XFB2F59FE701882	151. City 19XFB2F59FE701882
02	152. Make PTRB	153. Model TR	154. Color Blk	155. Make HON	156. Model CIV
02	157. Year 201	158. Plate No. A442363	159. State MS	160. Year 15	161. Plate No. Y78LFZ
02	162. VIN 1XPXD49X8JD476158	163. Express 11/19	164. VIN 19XFB2F59FE701882	165. Express 05/20	166. VIN 19XFB2F59FE701882
02	167. Vehicle Removed to: Destination	168. Vehicle Removed to: Destination	169. Vehicle Removed to: Destination	170. Vehicle Removed to: Destination	171. Vehicle Removed to: Destination
02	172. Driver's License Number 1006174	173. Date of Birth 10/06/74	174. Sex M	175. Driver's License Number A2564	176. Date of Birth 03/01/61
02	177. Driver's First Name INC	178. Driver's Last Name B	179. Driver's Sex M	180. Driver's First Name INC	181. Driver's Last Name B
02	182. Number & Street 86 Don Curt Rd	183. City Laurel, MS 39440-5430	184. State MS	185. Number & Street 19XFB2F59FE701882	186. City 19XFB2F59FE701882
02	187. Make PTRB	188. Model TR	189. Color Blk	190. Make HON	191. Model CIV
02	192. Year 201	193. Plate No. A442363	194. State MS	195. Year 15	196. Plate No. Y78LFZ
02	197. VIN 1XPXD49X8JD476158	198. Express 11/19	199. VIN 19XFB2F59FE701882	200. Express 05/20	201. VIN 19XFB2F59FE701882
02	202. Vehicle Removed to: Destination	203. Vehicle Removed to: Destination	204. Vehicle Removed to: Destination	205. Vehicle Removed to: Destination	206. Vehicle Removed to: Destination
02	207. Driver's License Number 1006174	208. Date of Birth 10/06/74	209. Sex M	210. Driver's License Number A2564	211. Date of Birth 03/01/61
02	212. Driver's First Name INC	213. Driver's Last Name B	214. Driver's Sex M	215. Driver's First Name INC	216. Driver's Last Name B
02	217. Number & Street 86 Don Curt Rd	218. City Laurel, MS 39440-5430	219. State MS	220. Number & Street 19XFB2F59FE701882	221. City 19XFB2F59FE701882
02	222. Make PTRB	223. Model TR	224. Color Blk	225. Make HON	226. Model CIV
02	227. Year 201	228. Plate No. A442363	229. State MS	230. Year 15	231. Plate No. Y78LFZ
02	232. VIN 1XPXD49X8JD476158	233. Express 11/19	234. VIN 19XFB2F59FE701882	235. Express 05/20	236. VIN 19XFB2F59FE701882
02	237. Vehicle Removed to: Destination	238. Vehicle Removed to: Destination	239. Vehicle Removed to: Destination	240. Vehicle Removed to: Destination	241. Vehicle Removed to: Destination
02	242. Driver's License Number 1006174	243. Date of Birth 10/06/74	244. Sex M	245. Driver's License Number A2564	246. Date of Birth 03/01/61
02	247. Driver's First Name INC	248. Driver's Last Name B	249. Driver's Sex M	250. Driver's First Name INC	251. Driver's Last Name B
02	252. Number & Street 86 Don Curt Rd	253. City Laurel, MS 39440-5430	254. State MS	255. Number & Street 19XFB2F59FE701882	256. City 19XFB2F59FE701882
02	257. Make PTRB	258. Model TR	259. Color Blk	260. Make HON	261. Model CIV
02	262. Year 201	263. Plate No. A442363	264. State MS	265. Year 15	266. Plate No. Y78LFZ
02	267. VIN 1XPXD49X8JD476158	268. Express 11/19	269. VIN 19XFB2F59FE701882	270. Express 05/20	271. VIN 19XFB2F59FE701882
02	272. Vehicle Removed to: Destination	273. Vehicle Removed to: Destination	274. Vehicle Removed to: Destination	275. Vehicle Removed to: Destination	276. Vehicle Removed to: Destination
02	277. Driver's License Number 1006174	278. Date of Birth 10/06/74	279. Sex M	280. Driver's License Number A2564	281. Date of Birth 03/01/61
02	282. Driver's First Name INC	283. Driver's Last Name B	284. Driver's Sex M	285. Driver's First Name INC	286. Driver's Last Name B
02	287. Number & Street 86 Don Curt Rd	288. City Laurel, MS 39440-5430	289. State MS	290. Number & Street 19XFB2F59FE701882	291. City 19XFB2F59FE701882
02	292. Make PTRB	293. Model TR	294. Color Blk	295. Make HON	296. Model CIV
02	297. Year 201	298. Plate No. A442363	299. State MS	300. Year 15	301. Plate No. Y78LFZ
02	302. VIN 1XPXD49X8JD476158	303. Express 11/19	304. VIN 19XFB2F59FE701882	305. Express 05/20	306. VIN 19XFB2F59FE701882
02	307. Vehicle Removed to: Destination	308. Vehicle Removed to: Destination	309. Vehicle Removed to: Destination	310. Vehicle Removed to: Destination	311. Vehicle Removed to: Destination
02	312. Driver's License Number 1006174	313. Date of Birth 10/06/74	314. Sex M	315. Driver's License Number A2564	316. Date of Birth 03/01/61
02	317. Driver's First Name INC	318. Driver's Last Name B	319. Driver's Sex M	320. Driver's First Name INC	321. Driver's Last Name B
02	322. Number & Street 86 Don Curt Rd	323. City Laurel, MS 39440-5430	324. State MS	325. Number & Street 19XFB2F59FE701882	326. City 19XFB2F59FE701882
02	327. Make PTRB	328. Model TR	329. Color Blk	330. Make HON	331. Model CIV
02	332. Year 201	333. Plate No. A442363	334. State MS	335. Year 15	336. Plate No. Y78LFZ
02	337. VIN 1XPXD49X8JD476158	338. Express 11/19	339. VIN 19XFB2F59FE701882	340. Express 05/20	341. VIN 19XFB2F59FE701882
02	342. Vehicle Removed to: Destination	343. Vehicle Removed to: Destination	344. Vehicle Removed to: Destination	345. Vehicle Removed to: Destination	346. Vehicle Removed to: Destination
02	347. Driver's License Number 1006174	348. Date of Birth 10/06/74	349. Sex M	350. Driver's License Number A2564	351. Date of Birth 03/01/61
02	352. Driver's First Name INC	353. Driver's Last Name B	354. Driver's Sex M	355. Driver's First Name INC	356. Driver's Last Name B
02	357. Number & Street 86 Don Curt Rd	358. City Laurel, MS 39440-5430	359. State MS	360. Number & Street 19XFB2F59FE701882	361. City 19XFB2F59FE701882
02	362. Make PTRB	363. Model TR	364. Color Blk	365. Make HON	366. Model CIV
02	367. Year 201	368. Plate No. A442363	369. State MS	370. Year 15	371. Plate No. Y78LFZ
02	372. VIN 1XPXD49X8JD476158	373. Express 11/19	374. VIN 19XFB2F59FE701882	375. Express 05/20	376. VIN 19XFB2F59FE701882
02	377. Vehicle Removed to: Destination	378. Vehicle Removed to: Destination	379. Vehicle Removed to: Destination	380. Vehicle Removed to: Destination	381. Vehicle Removed to: Destination
02	382. Driver's License Number 1006174	383. Date of Birth 10/06/74	384. Sex M	385. Driver's License Number A2564	386. Date of Birth 03/01/61
02	387. Driver's First Name INC	388. Driver's Last Name B	389. Driver's Sex M	390. Driver's First Name INC	391. Driver's Last Name B
02	392. Number & Street 86 Don Curt Rd	393. City Laurel, MS 39440-5430	394. State MS	395. Number & Street 19XFB2F59FE701882	396. City 19XFB2F59FE701882
02	397. Make PTRB	398. Model TR	399. Color Blk	400. Make HON	401. Model CIV
02	402. Year 201	403. Plate No. A442363	404. State MS	405. Year 15	406. Plate No. Y78LFZ
02	407. VIN 1XPXD49X8JD476158	408. Express 11/19	409. VIN 19XFB2F59FE701882	410. Express 05/20	411. VIN 19XFB2F59FE701882
02	412. Vehicle Removed to: Destination	413. Vehicle Removed to: Destination	414. Vehicle Removed to: Destination	415. Vehicle Removed to: Destination	416. Vehicle Removed to: Destination
02	417. Driver's License Number 1006174	418. Date of Birth 10/06/74	419. Sex M	420. Driver's License Number A2564	421. Date of Birth 03/01/61
02	422. Driver's First Name INC	423. Driver's Last Name B	424. Driver's Sex M	425. Driver's First Name INC	426. Driver's Last Name B
02	427. Number & Street 86 Don Curt Rd	428. City Laurel, MS 39440-5430	429. State MS	430. Number & Street 19XFB2F59FE701882	431. City 19XFB2F59FE701882
02	432. Make PTRB	433. Model TR	434. Color Blk	435. Make HON	436. Model CIV
02	437. Year 201	438. Plate No. A442363	439. State MS	440. Year 15	441. Plate No. Y78LFZ
02	442. VIN 1XPXD49X8JD476158	443. Express 11/19	444. VIN 19XFB2F59FE701882	445. Express 05/20	446. VIN 19XFB2F59FE701882
02	447. Vehicle Removed to: Destination	448. Vehicle Removed to: Destination	449. Vehicle Removed to: Destination	450. Vehicle Removed to: Destination	451. Vehicle Removed to: Destination
02	452. Driver's License Number 1006174	453. Date of Birth 10/06/74	454. Sex M	455. Driver's License Number A2564	456. Date of Birth 03/01/61
02	457. Driver's First Name INC	458. Driver's Last Name B	459. Driver's Sex M	460. Driver's First Name INC	461. Driver's Last Name B
02	462. Number & Street 86 Don Curt Rd	463. City Laurel, MS 39440-5430	464. State MS	465. Number & Street 19XFB2F59FE701882	466. City 19XFB2F59FE701882
02	467. Make PTRB				

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Crash Investigation Report												19-165084				Page 2 of 1	
	03	04	05	06	07	08	09	10	11	12	13	14	15	Names & Addresses of Occupants # Occupied, Date & Time of Death			
E																	
F																	
G																	
H																	
I																	
J																	



145. Crash Description/Narrative

Driver 1 stated while attempting to exit the jug handle next to 819 North Avenue East (McDonald's) he was exiting into the left lane when he observed V2 cross over from the middle lane onto the left lane causing him to strike the front driver side door of V2

Driver 2 stated while traveling eastbound on North Avenue East, he was traveling in the left lane when he observed V1 exit the jug handle located next to 819 North Avenue East. V2 further stated V1 proceeded through the jug handle and subsequently struck the front driver side door of his vehicle

V1 Trailer Information:

Registration TLR44036T

EXP 04/2020

VIN 1UYVS2534J6302325

IOC # 1034567424

DECAL # 9TL R44036T

146. Officer's Signature

Toro, Michael: PO T931

147. Badge

148. Reviewer

Badge

149. Case Status

☐ Pending ☒ Complete